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 AUTH. NAME AUTHOR AFFILIATION
 URRIG, R.E. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Responds to 820426 ltr discussing operator action during
 postulated main steam line break. Justifies time out which
 credit taken for operator action in analysis for IE Bulletin
 82-04.

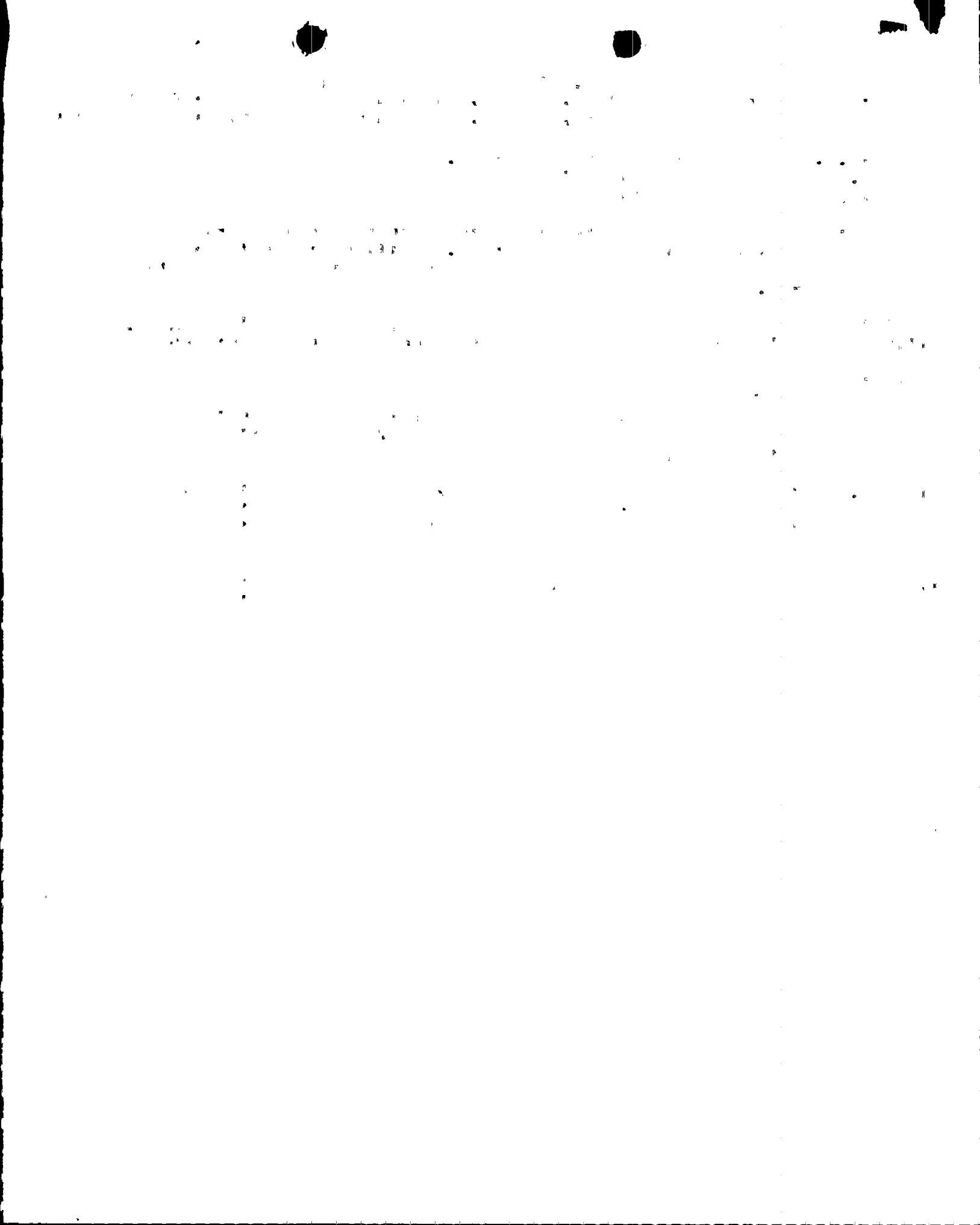
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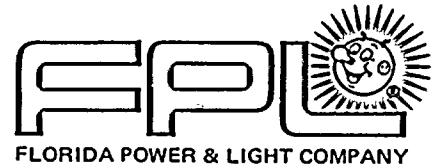
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May 21, 1982
L-82-215

Office of Nuclear Reactor Regulation
Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Varga:

Re: Turkey Point Units 3 & 4
Docket No. 50-250, 50-251
IE Bulletin 80-04

Florida Power & Light has reviewed your letter dated April 26, 1982 concerning operator action during a postulated main steam line break event. That letter requested that we discuss the operator actions necessary to prevent exceeding containment design pressure. As we discussed in our letter (L-81-211) dated May 19, 1981, the operator determines the faulted steam generator by comparing steam line pressure after the Main Steamline Isolation Valves are closed. A low steam line pressure compared to the other loops denotes a faulted loop. The operator then closes the valves in the auxiliary feedwater line supplying the damaged steam generator. The operator actions are further described in Emergency Operating Procedure 20002.2 (Loss of Secondary Coolant) which is attached.

Your letter also asked for justification for the time at which credit was taken for operator action in our analysis for IE Bulletin 80-04. In the description of our analysis, we stated that credit was taken for operator action at 10 minutes to isolate auxiliary feed flow to the faulted steam generator. This assumption was made for the analysis with both the existing steam generators and those to be used in the repair project. It has been our experience that at simulator exercises, when operators have been given a main steam line break event, they have routinely performed the necessary isolation of auxiliary feedwater well within the assumed 10 minutes. We credit this performance to the training emphasis that has been placed on this isolation action during the main steam line break event. Based on our simulator experience, we are confident that the assumed time limit for operator action in the analysis is a conservative assumption.

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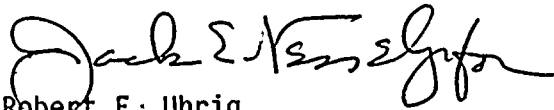
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Re: Turkey Point Units 3 & 4
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The second question in your letter was to provide information based on an analysis with the assumption that the operator would take no action to isolate the auxiliary feedwater flow to the faulted steam generator. Again, based on our simulator experience we are confident that the operators would take the necessary action. We, therefore, do not see the necessity to conduct an analysis with the invalid assumption that the operator would take no action.

Should you have further questions on the operator's actions in this event, please call us.

Very truly yours,



Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/JEM/mbd

cc: J.P. O'Reilly, Region II
Harold F. Reis, Esquire

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